REMARKS

This response is to the Office Letter mailed in the above-referenced case on January 28, 2004, made final. Claims 1-28 are presented for examination. The Examiner rejects claims 1-4, 6-11, 15-21 and 23-26 under 35 U.S.C. 102(b) as being anticipated by Brown (US 5,740,361) hereinafter Brown. Claims 5 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Clark et al. (U.S. 6,058,378) hereinafter Clark. Claims 12, 13, 14, 27 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Brown in view of Thomopoulos et al. (US 5,978,495) hereinafter Thomopoulos.

The applicant has carefully noted and reviewed the Examiner's rejections, references and comments. Applicant herein argues the patentability of the claims over the prior art of Brown.

The last Response provided by applicant included an argument that applicant's service, as claimed, actually verifies the user's identity by navigating to a target site and verifies provided information from the user. Applicant argues that Brown fails to provide a navigation utility to verify user log in information, reporting back results as claimed. The pass phrase is verified in Brown, not the identity of the user as in applicant's invention.

Applicant claims a third server node connected the network and accessible from the second server node, the third server node for navigating on the network by proxy according to navigation requests communicated from the second server node.

The Examiner responds to the above argument referencing Brown (col. 17, lines 1-20; the Web server). Applicant reads this portion of Brown to teach a method of accomplishing RPA by creating a security context representing a logical connection between the user and a Web server. Lines 21 -25 continue to teach that a server may make the context identifiers unique

instead of (client IP address, identifier) pairs. Applicant asserts that this suggests actual navigation is not taking place because the server may alter the information.

Applicant argues that this portion fails to teach that navigation actually takes place by the third server node for navigating on the network by proxy according to navigation requests communicated from the second server node, as claimed.

Applicant argues that Brown fails to teach the third navigation server. The Examiner is reaching when attempting to interpret Browns teaching of col. 17 lines 1-20 to read on applicant's limitations as claimed. If applicant were to accept the Examiner's interpretation then the target site would be the user's IP address, which does not qualify as a target site requiring a user name and password to enter. The Examiner's interpretation of Brown simply fails. There is no navigation server third server node connected the network and accessible from the second server node, (Brown's authentication deity) wherein the third server node is for navigating on the network by proxy according to navigation requests communicated from the second server node.

Applicants invention requires 4 separate server/nodes to accomplish actual user identity verification by authenticating information provided by the user node to the second server node (verifying server); wherein the second server node utilizes a third server node to actually navigate to a target site based on the information provided by the second server node. Applicant claims a first, second and third server and a user node. Brown teaches 3 server/nodes; a user, a service and a authentication deity (col. 5, lines 15-21) There is no third server, in Brown, for navigation as directed by a second server a claimed in applicant's invention.

As a broad statement for the record, it appears the examination in this case is following the old path of investing prior art status in inventions that accomplish the same or a similar purpose as the invention in

examination, rather than following the principle that it is the actual limitations of the claim that must be found in the art. The Examiner in this case continues to use Brown to teach authenticating a user's identity by using a remote server. The problem with this approach in examination is that the rejections are not *prima facie*, in that they do not teach the actual physical limitations of the claimed apparatus. They only teach accomplishing a similar purpose.

Applicant argues that Brown fails to anticipate applicant's claimed invention. Applicant believes independent claims 1 and 15 are patentable over the art of Brown. Claims 2-14 and 16-28 are patentable on their own merits, or at least as depended from a patentable claim. It is therefore respectfully requested that this application be reconsidered, the claims be allowed, and that this case be passed quickly to issue.

If there are any time extensions needed beyond any extension specifically requested with this amendment, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
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